

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

Chapter 13

MICHAEL EARL CLARK, Debtor

Case No.: 17-00587-NPO

**RESPONSE TO DEBTOR'S MOTION TO REINSTATE  
CHAPTER 13 CASE**

COMES NOW, 1<sup>st</sup> Mississippi Federal Credit Union ("Creditor") through its attorney and files this *Response to Debtor's Motion to Reinstate Chapter 13 Case* and in support of said motion would show the following:

1. Creditor is the holder of a secured claim against the debtor, which is secured by real estate. Said claim is evidenced by a proof of claim filed herein as claim no. 9, which is incorporated herein.

2. Debtor has failed to make the required payments to the Trustee to fund his plan and as of this date is in arrears in the amount of \$3,100.00. As a result of Debtor's sporadic and irregular payments, Debtor's account with Creditor is now past due in the amount of \$2,685.97.

3. Debtor has not provided the Court with any change in circumstances that would assure the Court that he can make regular and timely payments to the plan, and therefore, Creditor objects to the case being reinstated.

WHEREFORE, Creditor prays upon a final hearing herein that this Court will overrule Debtor's Motion to Reinstate the Chapter 13 Case.

RESPECTFULLY SUBMITTED, this the 15th day of February, 2018.

/s/ Robert M. Dreyfus, Jr.  
Attorney for Creditor

**CERTIFICATE OF SERVICE**

I, Robert M. Dreyfus, Jr., do hereby certify that I have this day served a true and correct copy of the above and foregoing *Response to Debtor's Motion to Reinstate Chapter 13 Case* via Notice of Electronic Filing (NEF) through the ECT System to the following:

Tylvester O. Goss, Attorney for Debtor  
J. C. Bell, Trustee  
U.S. Trustee

Dated: February 15, 2018.

/s/Robert M. Dreyfus, Jr.

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